

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Brillo Landfill - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #1
Initial Drum Sampling Event
Brillo Landfill
A27T
Cato, NY
Latitude: 43.1683611 Longitude: -76.6149088

To: Peter Lopez, USEPA Region 2, Regional Administrator
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From: Mark Gallo, On-Scene Coordinator

Date: 11/21/2017

Reporting Period: November 6 - 8, 2017

1. Introduction

1.1 Background

Site Number:	A27T	Contract Number:	EP-S2-15-01
D.O. Number:	0047	Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/6/2017	Start Date:	10/19/2017
Demob Date:		Completion Date:	
CERCLIS ID:	NYN000203129	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Removal Action (RV1) at a former non-hazardous waste Landfill.

1.1.2 Site Description

The Site is a former, inactive, non-hazardous waste landfill 113.7 acres in size which is overgrown and partially wooded with protected wetlands.

During the 1960s, plating waste from General Motors were believed to be disposed on the site on open ground and later covered with soil and seeded. In the 1970s and 80s, the owner operated a permitted non-hazardous, industrial waste landfill which received sewage treatment plant floatables and industrial grinding silica. Sometime prior to 1980, drums of waste were also deposited on site. In the early 1980s, these drums were removed as a condition of obtaining a non-hazardous waste disposal permit from the New York State Department of Environmental Conservation (NYSDEC). The permitted landfill closed in 1986.

During a 2015 NYSDEC remedial investigation sampling event at the Site, approximately 20 drums were uncovered in an area formerly believed to be a drum staging and disposal area. Historical information indicates the waste material may contain PCBs as well as plating wastes. On September 29, 2017 the NYSDEC requested EPA assistance to address the buried drums at the former drum staging and drum disposal areas which covers an approximate area of 0.5 to 0.75 acres.

1.1.2.1 Location

The Brillo Landfill Site is located on the north side of State Route 370, just west of the Village of Cato, Cayuga County, New York.

Latitude 43.168349 Longitude -76.614948

1.1.2.2 Description of Threat

There is a threat to groundwater from the release of wastes within buried drums at the Site. The initial EPA investigation identified several buried drums and drum carcasses in two areas of concern; former drum staging area and the former drum disposal area. Initial screening of several drums were observed to contain liquids which recorded elevated levels of volatile organic compounds (VOCs) (recorded by a photoionization detector) and elevated levels of LEL (Lower Explosive Level). Previous sampling of soil and groundwater by the NYSDEC, in the two areas of concern, has documented levels of VOCs and PCBs.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In November of 2015, NYSDEC excavated test pits and collected samples at several areas of the 113-acre site. During the NYSDEC remedial investigation, the NYSDEC identified two areas of concern (Drum Staging Area and Drum Disposal Area) in which they uncovered buried drums. Initial screening of those drums reported elevated levels of VOCs. Samples were collected from soil around the buried drums which reported elevated levels of VOCs and PCBs. On September 29, 2017, the NYSDEC referred the two areas of concern to EPA for consideration of a CERCLA Removal Action.

On November 6, 2017, EPA mobilized to the Site to conduct its initial investigation of the buried drums. On November 7-8, 2017, EPA conducted activities to gain access to and sample contents of several of the buried drums.

2. Current Activities

2.1 Operations Section

2.1.1 Response Actions to Date

EPA mobilized to the Site on November 6, 2017 with the support of EPA's Emergency and Rapid Response Services Contractor (ERRS) and the EPA's Removal Support Team Contractor (RST). On November 7-8, 2017, EPA excavated five former NYSDEC test pit areas which resulted in access to and the sampling of 10 buried drums.

During this initial investigation and sampling event, EPA observed several buried drums and drum carcasses. Drums were observed to have been disposed in a hap-hazard manner, many partially crushed and/or damaged with few drums in upright positions and many drums laying horizontal and/or at varying degrees from upright position. Drums observed in the former drum staging area were found to be deposited at shallower depths and partially in or below the groundwater zone. Drums observed in the former drum disposal area showed less impacts from groundwater however drums in this area were also observed to be damaged and in varying stages of decay.

Both liquids and solids were sampled from the drums accessed during the initial investigation. Samples collected were submitted to an accredited laboratory for analysis. The requested analysis included the following;

- Target Compound List (TCL) for VOCs
- TCL semi-volatile organic compounds (SVOCs)
- Target Analyte List (TAL) for metals plus mercury, cyanide, and hexavalent chromium
- PCBs, Pesticides, and Herbicides
- Full Toxicity Characteristic Leaching Procedure (TCLP) for RCRA hazardous waste determination (VOCs, SVOCs, Pesticides, Herbicides, PCBs)
- RCRA Characteristics of Ignitibility, Corrosivity, and Reactivity
- Target Organic Halide (TOX) analysis

Preliminary analytical results are anticipated during the week of November 27, 2017. As of November 9, 2017, all personnel and equipment have been demobilized from the Site.

2.1.2 Enforcement Activities

EPA is working with the NYSDEC on possible enforcement actions related to this Site.

2.1.3 Waste Disposition

Nothing to report at this time

<i>Waste Stream</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment / Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

- Receive and review analytical data from drum sampling event
- Develop Action Memorandum for full removal action if warranted by results of drum sampling event.

2.2.2 Issues

None to report at this time

2.3 Logistics Section

Nothing to report at this time

2.4 Finance Section

On September 25, 2017, A verbal authorization of \$100,000 for mitigation funding and \$50,000 for RST contractor funding was provided by the EPA Region 2 Emergency Response and Remediation Division's Acting Division Director to conduct initial actions at the Site. On September 29, 2017, an initial Task Order was issued to ERRS Contractor for \$100,000.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$100,000.00	\$20,000.00	\$80,000.00	80.00%
RST 3 - Removal Support Team Contractor	\$50,000.00	\$32,000.00	\$18,000.00	36.00%
Intramural Costs				
Total Site Costs	\$150,000.00	\$52,000.00	\$98,000.00	65.33%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information to report at this time

3. Participating Entities

EPA is conducting this action under its CERCLA authority. EPA has been communicating actions with the NYSDEC and will coordinate activities with NYSDEC as necessary.

4. Personnel On Site

The following list identifies the personnel present at the Site during the reporting period for this report

- (1) EPA Region 2 OSC
- (4) EPA ERRS Contractors
- (2) EPA RST-3 Contractors

5. Definition of Terms

None

6. Additional sources of information

Nothing to report at this time

7. Situational Reference Materials

None at this time

BRILLO LANDFILL

Message Sent @ 11/22/2017 7:33:49 AM

Pollution Report # (Initial)1 Brillo Landfill - Initial Drum Sampling Event

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